



SEALED

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District of Nevada
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FILED.

DATED: 1:07 pm, January 06, 2023

U.S. MAGISTRATE JUDGE

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ADRIAN ISALIAH QUEBEC,

Defendant.

Case No. 2:23-mj-00012-BNW

Application to Seal

(Under Seal)

The United States of America, by and through Jason M. Frierson, United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, respectfully move this Honorable Court for an Order sealing the Complaint, Probable Cause Affidavit, Arrest Warrant, AO257, this Application, and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

Pursuant to LR IA 10-5, the Government requests that the accompanying Complaint in this case be filed under seal. *See generally*, Fed. R. Crim. P. 6(e)(4) (permitting for the sealing of an indictment); *State of Arizona v. Maypenny*, 672 F.2d 761, 765 (9th Cir. 1982) (supporting the sealing of a search warrant when there is reasonable cause to believe that providing immediate

1 notification may have adverse results); *Matter of Sealed Affidavit(s) to Search Warrants*, 600 F.2d
2 1256 (9th Cir. 1979) (same); *In re Braughton*, 520 F.2d 765, 766 (9th Cir. 1975) (same). In this
3 case, such an order would be appropriate because the Complaint and Affidavit relate to an
4 ongoing criminal investigation into violations of 18 U.S.C. §§ 922(g)(1) and 924(a)(2) (*Felon in*
5 *Possession of a Firearm*) that is not public and its disclosure may alert the target to the ongoing
6 investigation and pending arrest warrant.

7 Public disclosure of the information in the Complaint might possibly jeopardize the
8 investigation because Defendant Adrian Isaiah Quebec is not yet in custody. Quebec is
9 unaware federal charges are being sought against him. If he were to learn of the charges via an
10 unsealed Complaint, he may take evasive measures or destroy potential evidence, or both.
11 Defendant Quebec's knowledge that an arrest warrant has been issued against him may also
12 increase risks to law enforcement in apprehending him. Accordingly, there is reason to believe
13 that disclosure of the information will jeopardize the investigation, including by giving him an
14 opportunity to flee, destroy or tamper with evidence, change patterns of behavior, or notify
15 confederates.

16 DATED this 5th day of January, 2023.

17 Respectfully submitted,

18 JASON M. FRIERSON
19 United States Attorney

20 *Bianca R. Pucci*

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BIANCA PUCCI
22 Assistant United States Attorney
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Case No. 2:23-mj-00012-BNW

ORDER TO SEAL

(Under Seal)

Based on the pending Application of the Government, and good cause appearing therefore, **IT IS HEREBY ORDERED** that the Complaint, the Probable Cause Affidavit, Arrest Warrant, AO257, the Government's Application, and this Court's Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 6th day of January, 2023.



Brenda N. Weksler
HONORABLE BRENDA N. WEKSLER
UNITED STATES MAGISTRATE JUDGE